

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In re: PARAQUAT PRODUCTS LIABILITY
LITIGATION

This Document relates to:

MATTHEW COWARD,

Plaintiff,

v.

SYNGENTA CROP PROTECTION, LLC;
SYNGENTA AG;
CHEVRON U.S.A., INC.,

Defendants.

Case No. 3:21-pq-01560-NJR

MDL No. 3004

NOTICE OF APPEAL

NOTICE is hereby given that Matthew Coward, Plaintiff in the above-named case, hereby appeals to the United States Court of Appeals for the Seventh Circuit from the final judgment entered in this matter (ECF No. 21) on April 17, 2024, and all orders merged into that final judgment, including but not limited to the orders in the multi-district litigation proceeding *In re: Paraquat Products Liability Litigation*, MDL No. 3:21-md-03004-NJR (S.D. Ill.) (“MDL”) granting (i) Defendants’ Motion to Exclude Plaintiffs’ Expert Dr. Martin Wells (MDL ECF No. 5237); and (ii) Defendants’ joint motion for summary judgment (MDL ECF No. 5238).

Plaintiffs in the three other trial selection cases will timely file their respective Notices of Appeal concurrent with the filing of this notice of appeal on May 16, 2024. Because plaintiffs in all four trial selection cases will be represented by the same counsel on appeal, and their appeals raise the same issues, Plaintiff respectfully requests that the Court of Appeals consolidate this appeal with the three other trial selection cases: *Richter v. Syngenta AG, et al.*, No. 3:21-pq-00571-

NJR; *Fuller v. Syngenta AG, et al.*, No. 3:21-pq-00836-NJR; and *Burgener v. Syngenta AG, et al.*, No. 3:21-pq-01218-NJR.

Dated: May 16, 2024

Respectfully submitted,

/s/ LaRuby May

LaRuby May
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGHEY, P.A.
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: (850) 435-7084
lmay@levinlaw.com

Sarah Shoemake Doles
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGHEY, P.A.
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: (850) 435-7011
sdoles@levinlaw.com

Khaldoun A. Baghdadi
WALKUP, MELODIA, KELLY &
SCHOENBERGER
650 California Street, 26th Floor
San Francisco, CA 94108
Telephone: (415) 981-7210
kbaghdadi@walkuplawoffice.com

Peter J. Flowers
MEYERS & FLOWERS, LLC
225 West Wacker Drive, Suite 1515
Chicago, IL 60606
Telephone: (630) 232-6333
pjf@meyers-flowers.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, LaRuby May, hereby certify that on May 16, 2024, I electronically filed the foregoing with the Clerk of the United States District Court for the Southern District of Illinois using the Court's CM/ECF Filing System, which will send electronic notification of such filing to counsel of record.

/s/ *LaRuby May*
LaRuby May